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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., et al.,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**STIPULATION AND AGREED ORDER
RESOLVING MOTION OF THE NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE TO INTERVENE IN CHAPTER 11 CASE**

1. On August 7, 2020, the National Association for the Advancement of Colored People (the “NAACP”) filed a Motion to Intervene in these chapter 11 cases on behalf of communities of color, seeking to ensure that distributions received pursuant to any confirmed

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

chapter 11 plan are appropriately allocated to communities of color that have been affected by the opioid crisis (the “**NAACP Motion**”) [Dkt. No. 1555].

2. Recognizing the importance of the issues raised in the NAACP Motion, the Debtors, the Official Committee of Unsecured Creditors (the “**UCC**”), the Ad Hoc Committee (the “**AHC**”), the Non-Consenting States Group (the “**NCSG**”), the Multi-State Governmental Entities Group (the “**MSG Group**”), and together with the AHC and the NCSG, the “**Public Claimant Groups**”), the Independent Public Schools (the “**IPS**”), and the NAACP (collectively, the “**Parties**”) have, subject to Court approval, agreed to resolve the NAACP Motion such that the NAACP Motion be granted and implemented on the terms set forth in this Stipulation.

AGREEMENT

3. The Parties agree as follows:

- a. The NAACP agrees to be bound by the mediation rules and confidentiality, and any other pertinent provisions, as articulated in the *Order Appointing Mediators* [Dkt. No. 895] (the “**Mediation Order**”). The NAACP further agrees to sign onto the Protective Order entered in these cases.
- b. The NAACP will have the opportunity to present its position on the current state of the public abatement plan, including provisions it feels should be revised or added on a confidential basis (pursuant to the Mediation Order), to (i) the Mediators, the Debtors, the UCC, and the Public Claimant Groups while mediation is ongoing and (ii) to any other Mediation Parties (as defined in the Mediation Order), or any other parties participating in the mediation by stipulation, including the IPS, following the conclusion of the mediation.

- c. The NAACP agrees to reasonably coordinate with the Public Claimant Groups, and will not seek to delay or hinder the progress of the ongoing Mediation. Further, to ensure that the NAACP has adequate time to review and provide comments and suggestions to the Parties and the Mediators, the Public Claimant Groups will provide the NAACP with the most recent public abatement plan, subject to the confidentiality and privilege protections of the Mediation Order.
- d. The NAACP has a hearing pending on the NAACP Motion that is due to be heard on August 26, 2020, at 10:00 a.m. The Public Claimant Groups and the Debtors have all filed statements in support of the NAACP Motion, and the UCC and the IPS support the NAACP Motion. Should this Honorable Court grant the NAACP Motion in accordance with this Stipulation, nothing herein is meant to limit or curtail the advocacy of the NAACP, or its ability to be heard in later proceedings of the Court following the conclusion of the mediation process.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: August 25, 2020
New York, New York

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So Ordered;

Dated: _____, 2020
White Plains, New York

THE HONORABLE ROBERT D DRAIN
UNITED STATES BANKRUPTCY JUDGE